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June 6, 2000

Redacted – for Public Inspection

Notice of Ex Parte Presentation

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED
JUN - 6 2000
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: *Application of SBC Communications Inc. Pursuant to Section 271 of the
Telecommunications Act of 1996 to Provide In-Region, InterLATA
Services in Texas, CC Docket No. 00-65*

Dear Ms. Salas:

On June 5, 2000, Priscilla Hill-Ardoin, Cindy Mahowald, and Eddie Rodriguez of SBC and the undersigned representing SBC met with Jake Jennings, Bill Dever, Margaret Egler, Daniel Schiman, and John Stanley of the Common Carrier Bureau to discuss line sharing, access to BRI loops, hot cuts, and OSS.

Line Sharing

SBC made the following clarifying points regarding line sharing. SWBT does not require that a CLEC obtain two lines in order to provide both voice and data services. If a CLEC seeks only to obtain access to the high frequency portion of the loop (the "HFPL") and requests line sharing as defined in the Commission's *Line Sharing Order*, SWBT will provide the splitter at the CLEC's option, thus allowing the same line to be used for both SWBT's voice service and the CLEC's data service. If a CLEC wants to provide both voice and data services to its customer over the same line, it may do so over a single xDSL-capable unbundled loop, terminated to its collocated splitter and DSLAM equipment. If a voice CLEC wants to partner with a data CLEC and provide voice and data service over the same line, one of the two CLECs can order a single xDSL-capable unbundled loop terminated to the collocated splitter and DSLAM equipment. The other CLEC would then connect its switching to the voice channel of the single loop.

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If a CLEC is providing voice service on a UNE platform, they can use existing methods and procedures for ordering (1) an unbundled xDSL-capable loop terminated to a collocated splitter and DSLAM equipment and (2) unbundled switching combined with shared transport to replace its UNE platform with a configuration that allows provisioning of data and voice. SWBT will, to the extent feasible, provide the loop that was part of the existing UNE platform as the unbundled xDSL-capable loop. There are, however, circumstances where the loop that compromises the UNE platform is not xDSL-capable. For example, where the UNE platform is part of a DLC architecture or exceeds distance limitations for xDSL, such loops would not be xDSL-capable and could not be provisioned as an xDSL-capable unbundled loop. In these circumstances, modifications to the existing loop or other alternatives would need to be considered to determine if an xDSL-capable loop could be provided. If an xDSL-capable loop could not be provided, then (assuming that the UNE platform is not served by DLC) the existing cooper loop could nevertheless be provided to the CLEC, but without representations as to its ability to support xDSL transmissions.

SWBT's current product development and operational resources are focused on providing mandatory line sharing as it was defined and ordered by the Commission's *Line Sharing Order*. SWBT began offering this incumbent LEC/CLEC line sharing arrangement (in which the CLEC provides the splitter) in all SWBT central offices on May 29, 2000. This was a week ahead of the Commission's required implementation date. The *Line Sharing Order* expressly states that incumbent LECs have discretion to maintain control over the splitter, but they are under no obligation to provide a splitter. 14 FCC Rcd. at 20940, ¶ 76. Although not obligated to do so, in response to CLEC requests, SBC has agreed to provide splitters in the incumbent LEC/CLEC line sharing arrangement. SBC's current splitter deployment schedule, which responds to current CLEC requests, can serve approximately 700,000 shared lines across 1,450 central offices in 13 states and is targeted to be complete this coming August.

SWBT is interested in exploring the use of SWBT's splitters to facilitate line sharing arrangements between two CLECs, where SWBT is not providing the voice service. SWBT views this as a potential business opportunity and intends to evaluate how it can respond to this market opportunity once SWBT's successful implementation of the line sharing arrangement mandated by the Commission is sufficiently well-established to ensure a consistent, quality product for SWBT's customers.

SWBT signed a draft interim agreement with provisions for line sharing in Texas with one CLEC on May 31, 2000. The final interim agreement was signed on June 2, 2000. The interim agreement is effective today, June 6. SWBT is currently negotiating with two other CLECs in Texas to provide SWBT/CLEC line sharing as well. These interim agreements have terms permitting either the CLEC or SWBT to provide the splitter. SWBT will negotiate with any other CLECs that wish to do so, for terms and conditions for such line sharing. These interim agreements are intended to bring SWBT's line sharing offering to market in a timely

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manner while still preserving the CLECs' right to negotiate terms and conditions through the 135 to 160-day day period described in 47 U.S.C. § 252(b)(1).

BRI Loops

The difficulties associated with using ISDN lines for provisioning IDSL service are industry-wide, as the affidavits of Carol Chapman in this proceeding have explained. This issue, and SWBT's plans to address these difficulties, have been under review at ongoing xDSL workshops conducted by the Texas PUC. These workshops were implemented in connection with the Rhythms/Covad arbitration award as a means of addressing xDSL operational issues on an ongoing basis. The workshops have been attended by SWBT and data CLECs including Covad, Rhythms, NorthPoint, and IP Communications.

Part of this collaborative process involves addressing the incompatibility issues currently experienced with SWBT's 2-wire digital loop (BRI) offering. The hardware vendor Marconi has developed a new channel card that will enable the DISC*S system to support the IDSL 144 kbps signal over all of the channels that currently support ISDN. SWBT has been working with Marconi to test this new channel card with the intent of developing a new IDSL-capable loop offering. Although the final test results have not been compiled, the initial results are positive and SWBT anticipates that the new loop service offering will be available this summer.

Since this will be a new loop offering, new contract language will be necessary. However, to speed implementation of the offering as much as possible for interested data providers, SWBT intends to offer an interim agreement for this new loop type. The interim agreement will provide a means for interested CLECs to begin ordering the new loop type on an interim basis while negotiating the final contract language. SWBT has not yet developed the full terms and conditions of the offer. The new loop offering will be priced on a non-discriminatory basis and in accordance with applicable Texas PUC and FCC pricing rules and regulations.

Until it is determined that the new Marconi channel card test is successful and this new IDSL-capable loop product becomes available, SWBT will continue to offer the options discussed in the Chapman/Dysart April 5, 2000 affidavit (¶¶ 57-62).

Hot Cuts

The accompanying materials relating to SWBT's hot cut performance were provided and discussed at the meeting. The Exhibits include the following:

Exhibit 1. Performance results for those aspects of the hot cut process that have been the focus of opponents' comments, showing SWBT's nondiscriminatory provision of hot cuts in accordance with the standards set out in the *Bell Atlantic New York Order*.

Exhibit 2. Performance results for PM 114 (premature disconnects) previously filed as Attachment E to the Supplemental Reply Affidavit of Brian D. Noland and William R. Dysart on May 19, 2000.

Exhibit 3. Performance results for PM 114.1 (hot cut duration) previously filed as Attachment B to the Supplemental Reply Affidavit of Brian D. Noland and William R. Dysart. February data includes reconciled data where the CLEC chose to reconcile with SWBT in accordance with the orders of the Texas PUC.

Exhibit 4. The first two charts provide performance results for PM 114.1 reported by lines and orders for the months December 1999 through April 2000, using reconciled data where available. The third chart shows SWBT's reported results for PM 114.1 by orders, without using reconciled data. These charts disprove claims that SWBT's line-based reporting pursuant to Texas PUC business rules skews the results in SWBT's favor as compared to Bell Atlantic-New York's reporting. The third chart shows that SWBT's reported results did not change significantly after the December, January, and February data reconciliations. Clerical corrections have been made to these charts; the charts provided on June 5 slightly understated SWBT's excellent performance.

Exhibits 5 and 6. "Gap Analyses" for December 1999 and February 2000 disproving AT&T's suggestion that CHC results for PM 114.1 currently are not reliable because the Texas PUC-defined measure stops the clock at the end of the hot cut, rather than when the CLEC is notified. AT&T has maintained that about 15 percent of its CHC orders in December 1999 and February 2000 had a gap between completion of the cut and notification to AT&T. (No gap was alleged on any order for January.) Based on PPIG materials reproduced in Noland/Dysart Supplemental Reply Affidavit Attachment A (and the Supplemental Reply Comments of AT&T, Exhibit I, Attach.14), the accompanying Exhibits 5 and 6 show that using the notification time for these orders, rather than the hot cut completion time, would not have any consequential effect on the percentage of hot cuts completed within even a 1-hour window, much less the Texas PUC's 2-hour window.

Exhibits 7 and 8. Data for December 1999 through March 2000, indicating trouble reports received within 7 and 10 days of CHC and FDT conversions. These results were previously provided as Attachment I to the Supplemental Reply Affidavit of Brian D. Noland and William R. Dysart and in SBC's May 30, 2000 ex parte submission.

Exhibits 9 and 10. Reconciled PPIG data for SWBT-caused outages on AT&T's CHC and FDT conversions for December 1999 through April 2000. This data excludes the SOAC problem in February, which was discussed in the Supplemental Affidavit of Candy R. Conway and William R. Dysart ¶¶ 10-11 (filed Apr. 5, 2000). Exhibit 10 additionally excludes items already reported in PM 114.

Exhibit 11. Reconciled PPIG data for SWBT-caused outages on AT&T's CHC and FDT conversions for December 1999 through April 2000. This chart excludes the SOAC problem in February and four hot cuts that were reported as outages by PPIG, but do not reflect a service interruption due to hot cut provisioning. Three of the excluded cuts experienced outages for reasons unrelated to the hot cut process (such as a cable cut shortly before the scheduled hot cut or a loop problem at the customer premises); one CHC cut took more than 1 hour, but the records of the cut do not indicate any unexpected loss of service. This chart, which better reflects actual outages experienced by customers than the raw PPIG "outage" results, further confirms SWBT's satisfaction of the *New York Order's* outage standards.

Exhibit 12. Reconciled PPIG data presenting the average duration of SWBT-caused outages for AT&T's CHC and FDT conversions for December 1999 through April 2000. This data excludes the SOAC problem in February. The April data are unofficial, although SWBT is not aware of any further reconciliation for April that remains to be completed by the PPIG.

Exhibits 13 through 16. Charts showing the actual duration of reconciled PPIG outages for AT&T's CHC and FDT conversions for December 1999 through April 2000, and calculating the average outage, the average outage when two extraordinary outages are removed, and the median outage. It should be noted that the reported outage duration includes the time taken by AT&T to report the outage to SWBT, which in some cases is the vast majority of the total outage. In some cases SWBT was able to fix the problem within minutes of receiving a report from AT&T.

Exhibit 17. A chart showing that CLECs increasingly are using the simple and efficient FDT process for which SWBT has waived its labor charges (*see* Noland/Dysart Supp. Reply Aff. ¶ 53) over the CHC process which is comparable to the coordinated process offered by Bell Atlantic in New York. As noted in the Noland/Dysart Supplemental Reply Affidavit, at paragraph 55, SWBT sets staffing levels on the conservative assumption that all hot cuts will be performed using the CHC process.

OSS

Also discussed were OSS issues, including SWBT's implementation of the address enhancement that became effective on May 27, 2000 and no longer requires an address to be filled in on conversion orders.

Magalie Roman Salas, Esq.
June 6, 2000
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An original and two copies of this cover letter and a redacted version of the hot cut presentation materials, are being submitted for inclusion in the public record. Please let me know if you have any questions about this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Austin C. Schlick". The signature is fluid and cursive, with the first name "Austin" and last name "Schlick" clearly distinguishable.

Austin C. Schlick

cc: Mr. Jennings
Mr. Dever
Ms. Egler
Mr. Schiman
Mr. Stanley
Ms. Wright
Ms. Attwood
Mr. Goldstein
Ms. Walker
Mr. Dixon
Ms. Whitesell
Ms. Nelson, Texas PUC
Mr. Russell, DOJ
Ms. Marshall, DOJ
Ms. Brown, DOJ
Mr. Fitch, DOJ
Ms. Heisler, DOJ
ITS

TEXAS § 271 APPLICATION
CC Docket No. 00-65

Hot Cut Performance

June 5, 2000

Redacted for Public Inspection

Exhibit 1 – Key Hot Cut Results

KEY HOT CUT RESULTS

Timeliness (combined CHC and FDT, 1-10 lines w/in 1 hour)

Feb.-Apr. (lines)	94.57%
Dec.-Apr. (lines)	93.12%
Dec.-Apr. (orders)	95.30%

Trouble Reports Within 7 days (combined CHC and FDT)

Dec.-Apr.	1.86%
Mar.-Apr.	1.55%

AT&T Reconciled Provisioning Outage Percentage (CHC)

Dec.-Apr. (orders)	5.21%
Dec.-Apr. (lines)	3.89%
Dec.-Apr. (orders/actual outages)	4.66%
Dec.-Apr. (lines/actual outages)	3.77%

AT&T Outage Duration (CHC/FDT; hours per order with a reported outage)

Dec.-Feb. (average per AT&T)	9/7
Dec.-Apr. (w/out SOAC)	6.5/6.8
Dec.-Apr. (excluding 2 anomalies)	3.6/4.6
Dec.-Apr. (median)	1.8/4.0

Exhibit 2 – Noland/Dysart Joint Supplemental Reply Affidavit Attachment E (Errata)

PM 114 Reconciled/Reported Results Summary

Feb-00					Mar-00						
	No. of Lines	No. Of Lines Disconn. Early	Percent Disconn. Early	Percent Disconn. On Time		No. of Lines	No. Of Lines Disconn. Early	Percent Disconn. Early	Percent Disconn. On Time		
FDT*	1-10 Lines	2140	103	4.81%	95.19%	FDT	1-10 Lines	2022	18	0.89%	99.11%
	11+ Lines	156	0	0.00%	100.00%		11+ Lines	97	12	12.37%	87.63%
	Total Lines	2296	103	4.49%	95.51%		Total Lines	2119	30	1.42%	98.58%
CHC*	1-10 Lines	1563	169	10.81%	89.19%	CHC	1-10 Lines	1851	15	0.81%	99.19%
	11+ Lines	327	85	25.99%	74.01%		11+ Lines	147	0	0.00%	100.00%
	Total Lines	1890	254	13.44%	86.56%		Total Lines	1998	15	0.75%	99.25%
Grand Total*	1-10 Lines	3703	272	7.35%	92.65%	Grand Total	1-10 Lines	3873	33	0.85%	99.15%
	11+ Lines	483	85	17.60%	82.40%		11+ Lines	244	12	4.92%	95.08%
	Total Lines	4186	357	8.53%	91.47%		Total Lines	4117	45	1.09%	98.91%
Apr-00					Feb - Apr Combined						
	No. of Lines	No. Of Lines Disconn. Early	Percent Disconn. Early	Percent Disconn. On Time		No. of Lines	No. Of Lines Disconn. Early	Percent Disconn. Early	Percent Disconn. On Time		
FDT	1-10 Lines	2200	15	0.68%	99.32%	FDT	1-10 Lines	6362	136	2.14%	97.86%
	11+ Lines	95	4	4.21%	95.79%		11+ Lines	348	16	4.60%	95.40%
	Total Lines	2295	19	0.83%	99.17%		Total Lines	6710	152	2.27%	97.73%
CHC	1-10 Lines	1294	13	1.00%	99.00%	CHC	1-10 Lines	4708	197	4.18%	95.82%
	11+ Lines	206	1	0.49%	99.51%		11+ Lines	680	86	12.65%	87.35%
	Total Lines	1500	14	0.93%	99.07%		Total Lines	5388	283	5.25%	94.75%
Grand Total	1-10 Lines	3494	28	0.80%	99.20%	Grand Total	1-10 Lines	11070	333	3.01%	96.99%
	11+ Lines	301	5	1.66%	98.34%		11+ Lines	1028	102	9.92%	90.08%
	Total Lines	3795	33	0.87%	99.13%		Total Lines	12098	435	3.60%	96.40%

* February includes reconciled data for CLECs that reconciled per TPUC Order #4, plus reported results for remaining CLECs

Exhibit 3 – Noland/Dysart Joint Supplemental Reply Affidavit Attachment B (Errata)

PM 114.1 Reconciled/Reported Results Summary											
Feb-00						Mar-00					
No. of Lines	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours		No. of Lines	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours	
FDT*						FDT					
1-10 Lines	2140	1996	93.27%	2034	95.05%	1-10 Lines	2022	1953	96.59%	1991	98.47%
11+ Lines	156	82	52.56%	94	60.26%	11+ Lines	97	86	88.66%	97	100.00%
Total Lines	2296	2078	90.51%	2128	92.68%	Total Lines	2119	2039	96.22%	2088	98.54%
CHC*						CHC					
1-10 Lines	1563	1494	95.59%	1548	99.04%	1-10 Lines	1851	1694	91.52%	1827	98.70%
11+ Lines	327	316	96.64%	327	100.00%	11+ Lines	147	98	66.67%	147	100.00%
Total Lines	1890	1810	95.77%	1875	99.21%	Total Lines	1998	1792	89.69%	1974	98.80%
Grand Total*						Grand Total					
1-10 Lines	3703	3490	94.25%	3582	96.73%	1-10 Lines	3873	3647	94.16%	3818	98.58%
11+ Lines	483	398	82.40%	421	87.16%	11+ Lines	244	184	75.41%	244	100.00%
Total Lines	4186	3888	92.88%	4003	95.63%	Total Lines	4117	3831	93.05%	4062	98.66%
Apr-00						Feb - Apr Combined					
No. of Lines	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours		No. of Lines	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours	
FDT						FDT					
1-10 Lines	2200	2101	95.50%	2173	98.77%	1-10 Lines	6362	6050	95.10%	6198	97.42%
11+ Lines	95	95	100.00%	95	100.00%	11+ Lines	348	263	75.57%	286	82.18%
Total Lines	2295	2196	95.69%	2268	98.82%	Total Lines	6710	6313	94.08%	6484	96.63%
CHC						CHC					
1-10 Lines	1294	1231	95.13%	1288	99.54%	1-10 Lines	4708	4419	93.86%	4663	99.04%
11+ Lines	206	183	88.83%	206	100.00%	11+ Lines	680	597	87.79%	680	100.00%
Total Lines	1500	1414	94.27%	1494	99.60%	Total Lines	5388	5016	93.10%	5343	99.16%
Grand Total						Grand Total					
1-10 Lines	3494	3332	95.36%	3461	99.06%	1-10 Lines	11070	10469	94.57%	10861	98.11%
11+ Lines	301	278	92.36%	301	100.00%	11+ Lines	1028	860	83.66%	966	93.97%
Total Lines	3795	3610	95.13%	3762	99.13%	Total Lines	12098	11329	93.64%	11827	97.76%

* February includes reconciled data for CLECs that reconciled per TPUC Order #4, plus reported results for remaining CLECs

Exhibit 4 – PM 114.1 (Reconciled/Reported by Lines, Reconciled/Reported by Orders, and
Reported by Orders)

Reconciled / Reported Conversion Duration - PM114 1											
Dec-99	No. of Lines	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours	Jan-00	No. of Lines	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours
FDT						FDT					
1-10 Lines	1918	1795	93.59%	1848	96.35%	1-10 Lines	1262	1183	93.74%	1205	95.48%
11+ Lines	178	156	87.64%	156	87.64%	11+ Lines	49	35	71.43%	35	71.43%
Total Lines	2096	1951	93.08%	2004	95.61%	Total Lines	1311	1218	92.91%	1240	94.58%
CHC						CHC					
1-10 Lines	1750	1513	86.46%	1650	94.29%	1-10 Lines	1044	911	87.26%	995	95.31%
11+ Lines	377	246	65.25%	344	91.25%	11+ Lines	285	285	100.00%	285	100.00%
Total Lines	2127	1759	82.70%	1994	93.75%	Total Lines	1329	1196	89.99%	1280	96.31%
Grand Total*						Grand Total*					
1-10 Lines	3668	3308	90.19%	3498	95.37%	1-10 Lines	2306	2094	90.81%	2200	95.40%
11+ Lines	555	402	72.43%	500	90.09%	11+ Lines	334	320	95.81%	320	95.81%
Total Lines	4223	3710	87.85%	3998	94.67%	Total Lines	2640	2414	91.44%	2520	95.45%
Feb-00	No. of Lines	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours	Mar-00	No. of Lines	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours
FDT						FDT					
1-10 Lines	2140	1996	93.27%	2034	95.05%	1-10 Lines	2022	1953	96.59%	1991	98.47%
11+ Lines	156	82	52.56%	94	60.26%	11+ Lines	97	86	88.66%	97	100.00%
Total Lines	2296	2078	90.51%	2128	92.68%	Total Lines	2119	2039	96.22%	2088	98.54%
CHC						CHC					
1-10 Lines	1563	1494	95.59%	1548	99.04%	1-10 Lines	1851	1694	91.52%	1827	98.70%
11+ Lines	327	316	96.64%	327	100.00%	11+ Lines	147	98	66.67%	147	100.00%
Total Lines	1890	1810	95.77%	1875	99.21%	Total Lines	1998	1792	89.69%	1974	98.80%
Grand Total*						Grand Total					
1-10 Lines	3703	3490	94.25%	3582	96.73%	1-10 Lines	3873	3647	94.16%	3818	98.58%
11+ Lines	483	398	82.40%	421	87.16%	11+ Lines	244	184	75.41%	244	100.00%
Total Lines	4186	3888	92.88%	4003	95.63%	Total Lines	4117	3831	93.05%	4062	98.66%
Apr-00	No. of Lines	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours	Dec - Apr Combined	No. of Lines	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours
FDT						FDT					
1-10 Lines	2200	2101	95.50%	2173	98.77%	1-10 Lines	9542	9028	94.61%	9251	96.95%
11+ Lines	95	95	100.00%	95	100.00%	11+ Lines	575	454	78.96%	477	82.96%
Total Lines	2295	2196	95.69%	2268	98.82%	Total Lines	10117	9482	93.72%	9728	96.15%
CHC						CHC					
1-10 Lines	1294	1231	95.13%	1288	99.54%	1-10 Lines	7502	6843	91.22%	7308	97.41%
11+ Lines	206	183	88.83%	206	100.00%	11+ Lines	1342	1128	84.05%	1309	97.54%
Total Lines	1500	1414	94.27%	1494	99.60%	Total Lines	8844	7971	90.13%	8617	97.43%
Grand Total						Grand Total*					
1-10 Lines	3494	3332	95.36%	3461	99.06%	1-10 Lines	17044	15871	93.12%	16559	97.15%
11+ Lines	301	278	92.36%	301	100.00%	11+ Lines	1917	1582	82.52%	1786	93.17%
Total Lines	3795	3610	95.13%	3762	99.13%	Total Lines	18961	17453	92.05%	18345	96.75%

Reconciled / Reported PM 114.1 Conversion Duration by Orders											
Dec-99	No. of Orders	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours	Jan-00	No. of Orders	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours
FDT						FDT					
1-10 Lines	967	930	96.17%	944	97.62%	1-10 Lines	599	569	94.99%	583	97.33%
11+ Lines	14	12	85.71%	12	85.71%	11+ Lines	5	4	80.00%	4	80.00%
Total # Orders	981	942	96.02%	956	97.45%	Total # Orders	604	573	94.87%	587	97.19%
CHC						CHC					
1-10 Lines	561	508	90.55%	531	94.65%	1-10 Lines	281	264	93.95%	275	97.86%
11+ Lines	30	20	66.67%	27	90.00%	11+ Lines	19	19	100.00%	19	100.00%
Total # Orders	591	528	89.34%	558	94.42%	Total # Orders	300	283	94.33%	294	98.00%
Grand Total						Grand Total					
1-10 Lines	1528	1438	94.11%	1475	96.53%	1-10 Lines	880	833	94.66%	858	97.50%
11+ Lines	44	32	72.73%	39	88.64%	11+ Lines	24	23	95.83%	23	95.83%
Total # Orders	1572	1470	93.51%	1514	96.31%	Total # Orders	904	856	94.69%	881	97.46%
Feb-00	No. of Orders	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours	Mar-00	No. of Orders	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours
FDT						FDT					
1-10 Lines	1040	993	95.48%	1007	96.83%	1-10 Lines	932	909	97.53%	916	98.28%
11+ Lines	10	6	60.00%	7	70.00%	11+ Lines	8	7	87.50%	8	100.00%
Total # Orders	1050	999	95.14%	1014	96.57%	Total # Orders	940	916	97.45%	924	98.30%
CHC						CHC					
1-10 Lines	490	470	95.92%	485	98.98%	1-10 Lines	514	463	90.08%	506	98.44%
11+ Lines	24	23	95.83%	24	100.00%	11+ Lines	24	18	75.00%	24	100.00%
Total # Orders	514	493	95.91%	509	99.03%	Total # Orders	538	481	89.41%	530	98.51%
Grand Total						Grand Total					
1-10 Lines	1530	1463	95.62%	1492	97.52%	1-10 Lines	1446	1372	94.88%	1422	98.34%
11+ Lines	34	29	85.29%	31	91.18%	11+ Lines	32	25	78.13%	32	100.00%
Total # Orders	1564	1492	95.40%	1523	97.38%	Total # Orders	1478	1397	94.52%	1454	98.38%
Apr-00	No. of Orders	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours	Dec - Apr Combined	No. of Orders	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours
FDT						FDT					
1-10 Lines	1064	1029	96.71%	1054	99.06%	1-10 Lines	4602	4430	96.26%	4504	97.87%
11+ Lines	7	7	100.00%	7	100.00%	11+ Lines	44	36	81.82%	38	86.36%
Total # Orders	1071	1036	96.73%	1061	99.07%	Total # Orders	4646	4466	96.13%	4542	97.76%
CHC						CHC					
1-10 Lines	419	409	97.61%	416	99.28%	1-10 Lines	2265	2114	93.33%	2213	97.70%
11+ Lines	15	12	80.00%	15	100.00%	11+ Lines	112	92	82.14%	109	97.32%
Total # Orders	434	421	97.00%	431	99.31%	Total # Orders	2377	2206	92.81%	2322	97.69%
Grand Total						Grand Total					
1-10 Lines	1483	1438	96.97%	1470	99.12%	1-10 Lines	6867	6544	95.30%	6717	97.82%
11+ Lines	22	19	86.36%	22	100.00%	11+ Lines	156	128	82.05%	147	94.23%
Total # Orders	1505	1457	96.81%	1492	99.14%	Total # Orders	7023	6672	95.00%	6864	97.74%

Reported PM 114.1 Conversion Duration by Orders

Dec-99	No. of Orders	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours	Jan-00	No. of Orders	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours
FDT						FDT					
1-10 Lines	972	938	96.50%	951	97.84%	1-10 Lines	603	577	95.69%	590	97.84%
11+ Lines	14	12	85.71%	12	85.71%	11+ Lines	5	4	80.00%	4	80.00%
Total # Orders	986	950	96.35%	963	97.67%	Total # Orders	608	581	95.56%	594	97.70%
CHC						CHC					
1-10 Lines	582	531	91.24%	558	95.88%	1-10 Lines	286	269	94.06%	280	97.90%
11+ Lines	30	20	66.67%	27	90.00%	11+ Lines	19	19	100.00%	19	100.00%
Total # Orders	612	551	90.03%	585	95.59%	Total # Orders	305	288	94.43%	299	98.03%
Grand Total						Grand Total					
1-10 Lines	1554	1469	94.53%	1509	97.10%	1-10 Lines	889	846	95.16%	870	97.86%
11+ Lines	44	32	72.73%	39	88.64%	11+ Lines	24	23	95.83%	23	95.83%
Total # Orders	1598	1501	93.93%	1548	96.87%	Total # Orders	913	869	95.18%	893	97.81%
Feb-00	No. of Orders	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours	Mar-00	No. of Orders	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours
FDT						FDT					
1-10 Lines	1040	998	95.96%	1011	97.21%	1-10 Lines	932	909	97.53%	916	98.28%
11+ Lines	10	6	60.00%	7	70.00%	11+ Lines	8	7	87.50%	8	100.00%
Total # Orders	1050	1004	95.62%	1018	96.95%	Total # Orders	940	916	97.45%	924	98.30%
CHC						CHC					
1-10 Lines	499	482	96.59%	495	99.20%	1-10 Lines	514	463	90.08%	506	98.44%
11+ Lines	24	23	95.83%	24	100.00%	11+ Lines	24	18	75.00%	24	100.00%
Total # Orders	523	505	96.56%	519	99.24%	Total # Orders	538	481	89.41%	530	98.51%
Grand Total						Grand Total					
1-10 Lines	1539	1480	96.17%	1506	97.86%	1-10 Lines	1446	1372	94.88%	1422	98.34%
11+ Lines	34	29	85.29%	31	91.18%	11+ Lines	32	25	78.13%	32	100.00%
Total # Orders	1573	1509	95.93%	1537	97.71%	Total # Orders	1478	1397	94.52%	1454	98.38%
Apr-00	No. of Orders	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours	Dec - Apr Combined	No. of Orders	Cuts Within 1 Hour	% within 1 Hour	Cuts Within 2 Hours	% Within 2 Hours
FDT						FDT					
1-10 Lines	1064	1029	96.71%	1054	99.06%	1-10 Lines	4611	4451	96.53%	4522	98.07%
11+ Lines	7	7	100.00%	7	100.00%	11+ Lines	44	36	81.82%	38	86.36%
Total # Orders	1071	1036	96.73%	1061	99.07%	Total # Orders	4655	4487	96.39%	4560	97.96%
CHC						CHC					
1-10 Lines	419	409	97.61%	416	99.28%	1-10 Lines	2300	2154	93.65%	2255	98.04%
11+ Lines	15	12	80.00%	15	100.00%	11+ Lines	112	92	82.14%	109	97.32%
Total # Orders	434	421	97.00%	431	99.31%	Total # Orders	2412	2246	93.12%	2364	98.01%
Grand Total						Grand Total					
1-10 Lines	1483	1438	96.97%	1470	99.12%	1-10 Lines	6911	6605	95.57%	6777	98.06%
11+ Lines	22	19	86.36%	22	100.00%	11+ Lines	156	128	82.05%	147	94.23%
Total # Orders	1505	1457	96.81%	1492	99.14%	Total # Orders	7067	6733	95.27%	6924	97.98%

Exhibit 5 – December Gap Analysis (*See* Supplemental Reply Comments of AT&T, Exhibit I, Attachment 14 for supporting material)

Redacted for Public Inspection

REDACTED
FOR
PUBLIC INSPECTION

Exhibit 6 – February Gap Analysis (*See* Supplemental Reply Comments of AT&T, Exhibit I Attachment 14 for supporting material)

Redacted for Public Inspection

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Exhibit 7 – Noland/Dysart Joint Supplemental Reply Affidavit Attachment I

I-7 vs I-10 Reports For UNE Loops (Texas)

COORDINATED HOT CUT (CHC)

	Number CHC I-7 Reports	Number CHC I-10 Reports	CHC Base I-7 & I-10	% I-7 Reports CHC	% I-10 Reports CHC
December	23	32	2127	1.08%	1.50%
January	26	27	1349	1.93%	2.00%
February	31	33	1896	1.64%	1.74%
March	27	29	1998	1.35%	1.45%
4-Month Total	107	121	7370	1.45%	1.64%

FRAME DUE TIME (FDT)

	Number FDT I-7 Reports	Number FDT I-10 Reports	FDT Base I-7 & I-10	% I-7 Reports FDT	% I-10 Reports FDT
December	62	73	2083	2.98%	3.50%
January	21	26	1293	1.62%	2.01%
February	66	74	2258	2.92%	3.28%
March	32	39	2119	1.51%	1.84%
4-Month Total	181	212	7753	2.33%	2.73%

COMBINED CHC AND FDT

	Number CHC/FDT I-7 Reports	Number CHC/FDT I-10 Reports	CHC/FDT Base I-7 & I-10	% I-7 Reports CHC/FDT	% I-10 Reports CHC/FDT
December	85	105	4210	2.02%	2.49%
January	47	53	2642	1.78%	2.01%
February	97	107	4154	2.34%	2.58%
March	59	68	4117	1.43%	1.65%
4-Month Total	288	333	15123	1.90%	2.20%

Exhibit 8 – Ex Parte of May 30, 2000

KELLOGG, HUBER, HANSEN, TODD & EVANS, P.L.L.C.

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Redacted – For Public Inspection

May 30, 2000

Ex Parte Submission

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Application of SBC Communications Inc. Pursuant to Section 271 of the
Telecommunications Act of 1996 to Provide In-Region, InterLATA
Services in Texas, CC Docket No. 00-65*

Dear Ms. Salas:

Enclosed for filing under seal please find the following materials:

(1) Tables disaggregating EDI rejects by error type. This information is being provided on both a CLEC-aggregated and CLEC-specific basis for the months February, March, and April 2000. Results for January 2000 were filed with the Commission on April 5, 2000, as Attachment H to the Supplemental Affidavit of Elizabeth Ham. As explained in paragraph 28 of the Supplemental Ham Affidavit, these error reports count each error that was identified on an LSR. Because there may be more than one error per LSR, the indicated overall error rates are greater than the percentage of rejected LSRs experienced by the relevant CLECs.

(2) A manual breakdown of SWBT's "I-30" trouble report for April 2000, indicating reports received within 7 and 10 days of CHC and FDT conversions. The "I-7" and "I-10" data for December 1999 through March 2000 were provided as Attachment I to the Supplemental Reply Affidavit of Brian D. Noland and William R. Dysart, filed on May 19, 2000. Averaging the 5 months' results shows an average trouble report rate of just 1.86% within 7 days of the hot cut. This is better than the *Bell Atlantic New York Order's* 2% standard. See *Bell Atlantic New York Order* ¶¶ 300 & nn.956 & 957, 309.